

***Remarks***

Applicants thank the Examiner for his careful consideration of this application and for the interview held on January 26, 2006. Reconsideration of this application is now respectfully requested in view of the amendments above and the following remarks.

Claims 1-29 remain pending in the application, with Claims 1, 27, and 29 being the independent claims. Claim 21 has been amended.

In particular, Claim 21 has been amended to address a formal issue discussed during the aforementioned interview. It is respectfully submitted that this amendment does not raise any new issues and will not require any further consideration or search (as it merely addresses a formal matter), and its entry should, therefore, be permitted.

At Pages 4-5, the Office Action rejects Claims 1, 2, 22, 25-27, and 29 under 35 U.S.C. § 103(a) as being anticipated by Maeda (U.S. Patent No. 6,625,316). At Pages 5-6, the Office Action rejects Claims 3-5 and 23 under 35 U.S.C. § 103(a) as being unpatentable over Maeda in view of Jasinski et al. (U.S. Patent No. 6,504,569). At Pages 6-7, the Office Action rejects Claims 6, 13, and 15 under 35 U.S.C. § 103(a) as being unpatentable over Maeda in view of Foreman et al. (U.S. Patent No. 6,628,303). At Pages 7-9, the Office Action rejects Claims 7-12, 14, 16-21, 24, and 28 under 35 U.S.C. § 103(a) as being unpatentable over Maeda in view of Petelycky et al. (U.S. Patent No. 6,204,840). Applicants respectfully traverse these rejections for the following reasons.

First, each of Claims 1, 27, and 29 recites the editing of a *camera-motion layer*.

"Camera-motion layers" are defined in Applicants' specification at paragraph [36] as being "layers that appear to move with the camera as the camera moves." While it is true that during patent examination, pending claims are given their "broadest reasonable interpretation" (*In re Hyatt*, 211 F.3d 1367, 1372, 54 USPQ2d 1664, 1667 (Fed. Cir. 2000) and M.P.E.P. § 2111), it is also noted that an applicant is entitled to be his own lexicographer (*In re Paulsen*, 30 F.3d 1475, 1480, 31 USPQ2d 1671, 1674 (Fed. Cir. 1994) and M.P.E.P. § 2111.01.III), and "[w]here an explicit definition is provided by the applicant for a term, that definition will control interpretation of the term as it is used in the claim" (M.P.E.P. § 2111.01.III, *citing Toro Co. v. White Consolidated Industries, Inc.*, 199 F.3d 1295, 1301, 53 USPQ2d 1065, 1069 (Fed. Cir. 1999)). Therefore, it is necessary to interpret the claims using this definition of "camera-motion layer." As discussed at the aforementioned interview, an example of this, to which the invention is not limited, may occur where a video camera is panning a scene (for example, when tracking an object moving across the scene). Neither Maeda nor any of the other cited prior art discusses the editing of a camera-motion layer. For at least this reason, therefore, these claims, as well as their dependent claims, are allowable over the cited prior art.

Second, each of Claims 1, 27, and 29 recites that a modified composite video sequence is obtained *without editing each frame of the original video sequence*. As shown, e.g., in Fig. 2 (see, e.g., reference numerals S103, S104, S112), Fig. 6 (see, e.g., reference numerals S120, S121, S125), col. 15, lines 16-20, and col. 17, lines 41-45 of Maeda, the method used in Maeda

edits each frame of the video sequence. Furthermore, Applicants have not found any applicable teaching or suggestion in any of the other cited references. For this additional reason, it is further submitted that Claims 1, 27, and 29, as well as their dependent claims, are allowable over the cited prior art.

For at least these reasons, therefore, it is respectfully submitted that Claims 1-29 are allowable over the cited prior art. Applicants respectfully request withdrawal of the above-mentioned rejections.

There are additional reasons for which various dependent claims are respectfully submitted to be allowable over the cited prior art, examples of which were noted in Applicants' previous Amendment and Reply filed on December 27, 2004. These arguments will not be repeated here in detail; however, Applicants maintain that none of them are contradicted by the Office Action's discussion at pages 2-4. For example, no part of this discussion addresses any of the arguments relating specifically to camera-motion layers (see above). Furthermore, at no point in this discussion does the Office Action address the question of Fig. 3F of Petelycky et al. being directed to audio effects, rather than video effects (and it is further noted that the Office Action at page 8 continues to rely on this). Additionally, as discussed at the interview, nowhere does Maeda (or any other cited reference) deal with editing camera motion parameters. Finally, the Zdepksi et al. reference (U.S. Patent No. 6,606,746) fails to teach or suggest the addition of a user-activated region to a camera-motion layer, as alleged, and Applicants continue to request a

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reference that shows that this is known if the use of Official Notice in the rejection of Claims 8 and 9 is to be maintained (as on page 8 of the Office Action).

While Applicants do not necessarily concur with the Office Action's characterizations of the claims and/or the references with regard to other claimed features, Applicants choose not to discuss each such feature. Consequently, the lack of explicit discussion is not to be understood as indicating tacit agreement with such characterizations.

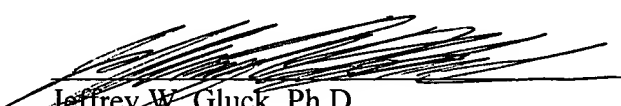
***Conclusion***

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants, therefore, respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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